

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America )

v. )

Johnny Jacob Domingue II )

YOB: 1989 )

United States Citizen )

Case No. M-20-1778-M

United States District Court  
Southern District of Texas  
FILED

SEP 09 2020

David J. Bradley, Clerk

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 9, 2020 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:*Code Section*

21 USC § 841(a)(1)

*Offense Description*

Possession with intent to Distribute a Controlled Substance more tha 5 kilograms of cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by: Anibal Alaniz

Submitted by reliable electronic means, sworn to  
and attested to telephonically per Fed. R. Cr. 4.1,  
and probable cause found on:Date: 09/09/2020 @ 8:36 p.m.City and state: McAllen, Texas/s/ Juan M. Varela Jr*Complainant's signature*Juan M. Varela Jr, HSI Special Agent*Printed name and title*  
*Judge's signature*U.S. Magistrate Judge Juan F. Alanis*Printed name and title*

**Attachment "A"**

1. I, Juan Manuel Varela Jr., am a Special Agent of the United States Homeland Security Investigations ("HSI") state the following:
2. Beginning in August 2020, Johnny Jacob Domingue ("Domingue") contacted an HSI confidential informant ("CI").
3. The CI and Domingue met while both were in federal custody at the Federal Detention Center in downtown Houston.
4. Once Domingue and the CI were released from prison, Domingue contacted the CI to assist him in finding a source of cocaine because Domingue had several potential buyers of the cocaine in Houston, Texas as well as in Louisiana.
5. During the course of the communications between the CI and Domingue, the CI introduced an undercover agent posing as a cocaine supplier to Domingue.
6. During several recorded telephone calls between Domingue and the undercover agent, the CI acting as an interpreter, they agreed that the undercover agent would provide 8 kilograms of cocaine to Domingue.
7. The agreement between Domingue and the undercover agent required Domingue to deliver 4 kilograms of cocaine to the undercover agent's "people" in Houston, Texas and for Domingue to distribute the other 4 kilograms to his buyers.
8. On September 9, 2020, HSI agents put 8 kilograms of a white powdery substance that tested positive for cocaine inside a hidden compartment of a vehicle.
9. HSI agents took a photograph of the bundles inside the compartment of the vehicle and the CI sent the photograph to Domingue via his cell phone.
10. The undercover agent told the CI to let Domingue know that the vehicle that contained the cocaine was parked at the Academy Sports and Outdoors located on Trento Road in Edinburg, Texas.
11. Agents installed a "kill switch" on the vehicle.
12. While conducting surveillance, agent saw Domingue arrive at the parking lot of Academy Sports and Outdoors and get inside the vehicle.
13. As Domingue attempted to leave the area, agents activated the "kill switch" which turned the vehicle off.
14. Agents approached and arrested Domingue.